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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

The Application of  
GANESAN, et al.

Application No: 09/298,889  
Filed: April 26, 1999

: Group Art Unit:3627

: Examiner: E. Gort

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GROUP 3600

For: ELECTRONIC BILL PRESENTMENT AND/OR PAYMENT CLEARINGHOUSE

APPEAL BRIEF

Assistant Commissioner for Patents  
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Sir:

This Appeal Brief is submitted (in triplicate) in support of the Notice of Appeal filed October 9, 2003 of the finally rejected claims as set forth in the final Official Action dated July 18, 2003.

I. REAL PARTY IN INTEREST

CheckFree Corporation, Reel 010003, Frame 0838.

## **II. RELATED APPEALS AND INTERFERENCES**

A Notice Of Appeal was filed on June 24, 2002, and an Appeal Brief was filed on November 25, 2002, in U.S. Patent Application Serial No. 09/299,102, filed on April 26, 1999, which is related to the present application. The United States Patent and Trademark Office issued a Notice of Allowance of U.S. Patent Application Serial No. 09/299,102 on August 26, 2003.

## **III. STATUS OF CLAIMS**

Claims 7, 8, 12-14, 17, 22, 23, 26, 27, and 29-32 are pending in this application, of which claims 7, 14 and 29 are independent. Each of claims 7, 8, 12-14, 17, 22, 23, 26, 27, and 29-32 is subject to appeal.

## **IV. STATUS OF AMENDMENTS**

A first amendment was filed on January 18, 2002 and was entered. A second amendment was filed on July 9, 2002 and was not entered. A Supplemental Amendment was filed on September 9, 2002 and was not entered. An RCE, including the non-entered claims of September 9, 2002, and a second Supplemental Amendment were filed on November 11, 2002. The RCE and the second Supplemental Amendment were entered. A third amendment was filed on July 13, 2003 and was entered.

## **V. SUMMARY OF INVENTION**

The invention will be summarized with reference to the preferred

embodiment(s)/implementation(s) shown in Figures 1-11 and described in the related specification text on pages 15-35.

According to the present invention, bills are presented and/or paid electronically, as shown in Figure 1, using a plurality of user stations 110A-110D and 120A-120D connected to a network 100, such as the Internet or some other public network. Each station represents a different user and may be a computer or other type of network device. The users include consumers and other purchasers of goods or services, often referred to herein as payers, and merchants and other providers of goods and services, often referred to herein as payees. Each of the payers has a checking, money market, home equity or other type of payment account and/or each of the payees has an investment, savings, money market or other type of deposit account maintained at one of a plurality of banks, brokerage houses and other financial institutes. The financial institutes are typically represented by FI stations 130A-130D which may be connected to the public network, such as the Internet, or could be connected to a private network, such as the long established private ACH banking network. Each financial institute is normally represented by a different FI station 130A-130D which typically includes one or more high powered computers.

A central station 140, typically including one or more high powered computers, e.g. network servers, has a processor(s) for receiving, for example over the Internet, an instruction, from a user station, for example, user station 110A representing one of the payers, to pay a bill of one of the payees. Receipt of bill payment instructions is shown, for example, in Figure 3, step 355, and discussed on

page 22, lines 7-9. Another example of payment instruction receipt is shown in Figures 7 and 8, step 800, and discussed on page 28, lines 6-12. Yet another example of payment instruction receipt is shown in Figures 9 and 10, step 1000, and discussed on page 29, lines 5-12.

The central station 140 is also configured, e.g. programmed, to generate a directive to transfer funds from a payment account of the payer maintained at a financial institute to a deposit account of the payee maintained at the same or another financial institute in accordance with the received instruction. Direction of payment by the central station 140 is discussed, for example, at page 17, lines 2-4. Another example of payment direction is shown in Figure 3, step 370, and discussed on page 22, lines 14-22. Still another example of payment direction is shown in Figure 4 and discussed on page 23, line 22, through page 24, line 20. The directive is preferably transmitted over the Internet or a private banking network to the financial institute maintaining the payment account.

The central station 140 also generates remittance information associated with the payment of the bill by the transfer of funds, as discussed, for example, on page 17, lines 5-8. In certain embodiments, the remittance information is stored in a central database 140B1, typically residing on a network memory included as part of the central station 140, so as to be accessible to another user station representing the payee, for example, user station 120A. Storage of remittance information in the central database 140B1 is discussed, for example, on page 16, lines 1 and 2, and page 17, lines 8-13. Central database could be, as desired, a relational database, a simplified depiction of which is shown in Figure 11.

Advantageously, the central station 140 is also capable of receiving, for example over the Internet, a request from the applicable payee station, in this example, station 120A, to access the stored remittance information. Responsive to the receipt of the request, the central station 140 retrieves the remittance information and transmits the retrieved remittance information, for example over the Internet, to the payee station. Hence, unlike conventional electronic bill payment systems, remittance information must be requested, i.e. pulled, by the payee rather than being automatically transmitted, i.e. pushed, to the payee. The pulling of stored remittance information is discussed, for example, on page 19, lines 3-13, and on page 23, lines 7-15.

In one particularly advantageous implementation, the generation and/or transmission of the payment directive to the financial institute at which the payment account is maintained occurs only after the receipt of the request for access to the stored remittance information, an example of which is discussed on page 23, line 22, through page 25, line 2, and is shown in Figure 4. This feature motivates payees to regularly request the remittance information in order to obtain payment. This in turn helps to avoid situations in which payments are made but not properly accounted for by the payee, which could result in improper dunning notices being issued by the payee to the payer notwithstanding prior payment of a bill.

In accordance with still other aspects of the invention, the central station 140 receives, for example over the Internet, a second bill, from a user station representing the same or a different payee for the same or a different payer. The central station 140 generates billing information representing the received second

bill. The billing information may be identical to the received bill, may represent the bill in a different format or may represent only that portion of the second bill which is necessary for the payer to determine whether or not to authorize payment of the bill. The billing information is stored, preferably in the central database at the central station 140, so as to be accessible to a user station representing the applicable payer. Receipt of a bill and generation and storage of billing information is discussed, for example, on page 17, line 20, through page 18, line 2, as well as on page 19, line 19, through page 20, line 17.

Beneficially, the central station is also capable of receiving a request, from the applicable payee station, to access the stored billing information for that payee. Responsive to this request, the central station retrieves the stored billing information, and then transmits the retrieved billing information to the payee station. Thus, a payer pulls stored billing information rather than stored billing information being pushed the payer. The pulling of stored billing information is discussed, for example, on page 20, line 18, through page 22, line 7.

## VI. ISSUES

Whether claims 7, 8, 12-14, 17, 22, 23, 26, 27, and 29-32 are anticipated by Chang et al. (U.S. Patent No. 5,884,288) under 35 U.S.C. §102(e).

Whether claims 7, 8, 12-14, 17, 22, 23, 26, 27, and 29-32 are obvious over Chang under 35 U.S.C. § 103(a).

Whether claims 7, 8, 12-14, 17, 22, 23, 26, and 27 are indefinite under 35 U.S.C. § 112, second paragraph.

### **VII. BRIEF DESCRIPTION OF THE PRIOR ART REFERENCE**

Chang et al. (U.S. Patent No. 5,884,288), is directed to an electronic billing and payment system utilizing electronic money associated with a bank (shown in Figure 2). According to the Chang reference, a biller (payee) delivers an electronic bill to a payer's bank where it is stored in an electronic mailbox associated with the payer (see, for example, column 4, lines 37-43, and column 6, lines 57-60). The payer accesses the electronic bill and transmits a payment authorization to the payer bank to pay the bill (see, for example, column 7, lines 1-4). The payer bank then generates and transmits to the payee an electronic check payable to the payee (see, for example, column 7, lines 25-30). The electronic check includes limited remittance information (see column 7, lines 48-56). The payee then electronically deposits the electronic check in a bank associated with the payee (see, for example, column 8, lines 36-38). The payee bank receiving the deposit then clears and settles the electronic check (see, for example, column 8, lines 21-25). The Chang payment technique is analogous to conventional payment by paper check, with the exception that the check is prepared by the payer's bank upon instruction of the payer and is electronic instead of paper.

### **VIII. THE REJECTION**

Claims 7, 8, 12-14, 17, 22, 23, 26, 27 and 29-30 stand finally rejected under 35 U.S.C. § 102(e) as anticipated by Chang et al. (U.S. Patent No. 5,884,288), and in the alternative, as obvious over Chang under 35 U.S.C. § 103(a). Claims 7, 8, 12-14, 17,

22, 23, 26, and 27 also stand finally rejected under 35 U.S.C. § 112, second paragraph, as being indefinite.

In a first substantive Official Action dated October 19, 2001, the Examiner rejected each of original claims 1-20 as being anticipated by Chang, while only making reference to Figure 2.

In a first Final Official Action dated May 9, 2002, in response to an Amendment submitted January 18, 2002, the Examiner rejected claims 1-20 and new claims 21-25 as being anticipated by Chang, and in the alternative rejected the claims as being obvious over Chang. In responding to the traversal arguments of the January 18, 2002 Amendment, the Examiner provided a more detailed rejection. In particular, the Examiner points to details 202 and 208 of Figure 2 as disclosing network stations capable of transmitting instructions to pay bills and requests to view stored remittance information, and to detail 206 and column 5, lines 10+, as disclosing payers having payment accounts and payees having deposit accounts. The Examiner has maintained these arguments throughout prosecution of the application. Also, the Examiner argues that a central station is disclosed by any of: the Internet and details 202, 206, and 208 of Figure 2, and that a central database “includes all data storage of the central station.”

Also in the Official Action of May 9, 2002, the Examiner points to Figure 8B as disclosing the transmission of a payment directive and the generation of remittance information, arguing that remittance information is generated by the payee “when payee accesses payor’s account and creates bill.” The Examiner also argues that remittance information is “presumably” stored in the bill payment database, detail 250

of Figure 2, and that remittance information is also stored by the payee, pointing to column 7, lines 9+ and 37+. As to a payee request to receive stored remittance information and transmission of the stored information responsive to the request, the Examiner does not point to any particular portion of Chang, but argues that this "occurs when payee creates the bill and remittance information and/or when payee updates account information when a payment is made. This step and the following step is carried out when the remittance information is created for the next months bill via payee on the payee's station prior to sending out the bill to payor." Also, the Examiner further argues that transmission of stored remittance information "occurs when payee on station receives the remittance information from the database to be used to submit bill to payor or to update account with payment."

As to the requirement of certain of the claims that a directive to transfer funds be transmitted after receipt of a request to access stored remittance information, the Examiner does not point to any particular portion of Chang, but instead argues that "directive to pay can only occur after payee has submitted electronic bill to payor which is created based on information received when bill was created."

In a first substantive Official Action, issued on March 10, 2003, subsequent to the filing of the RCE on November 12, 2002, the Examiner again rejected the pending claims under 35 U.S.C. § 103(a) as obvious over Chang, and in the alternative as being obvious over Chang. Additionally, Examiner rejected claims 7, 8, 12-14, 17, 22, 23, 26, and 27 as being indefinite under 35 U.S.C. § 112, second paragraph. The Examiner's prior art rejection arguments in this Action are essentially the same as that of the May 9, 2002 rejection, though the Examiner notes that the rejections are on new grounds.

In particular, the Examiner argues that the Internet and detail 206 of Figure 2, and details 804 and 806 of Figure 8B disclose a processor/central network station configured to receive payment instructions, to transmit directives to transfer funds, and to generate remittance information. The Examiner points to detail 250 of Figure 2, "other databases not shown but on the Internet," and payee accounting records discussed at column 7, line 9+ and line 37+ as disclosing a central database configured to store remittance information.

Additionally in this Action, the Examiner contends that Chang discloses generation of remittance information associated with payment of a bill, pointing again to Figure 8B, and again arguing that remittance information is generated by the payee, "when payee accesses payor's account and creates bill". The Examiner additionally argues that "remittance information includes the amount paid which is generated at the time the bill is paid, further the amount owed would also be generated to know what is outstanding."

As to the request for access to stored remittance information and the transmission of the stored remittance information responsive to the request, the Examiner now argues, without pointing to any text or Figure of Chang, that a request and transmission "occurs whenever payee accesses stored information, for example: when payee creates a bill, checks account status, updates account information or when payment is made directly to payee". Also, the Examiner maintains that Chang discloses generation of a directive to transfer funds only after receipt of a request to access remittance information, now arguing, "directives are commonly batched and may not have been generated until after the payee requests remittance information."

As to the 35 U.S.C. § 112, second paragraph, rejection, raised for the first time in this Action, even though these limitations were recited in originally filed claims, the Examiner argues that the difference between instruction(s) to make payment and directive(s) to transfer funds of independent claims 7 and 14 is unclear. In particular, the Examiner contends that the instruction(s) and directive(s) are redundant, arguing, "the directive to transfer funds inherently includes the payment of a bill, and vice versa. Payment inherently includes a transfer of funds. It is unclear what additional limitation is being added by stating both."

In the second Final Official Action, issued July 18, 2003, the prior art and indefiniteness rejections are maintained, notwithstanding the further traversal arguments submitted in the Amendment filed on June 13, 2003. The Examiner maintains the same grounds for the indefiniteness rejections relied upon in the March 10, 2003 rejection.

However, the Examiner shifts grounds of the prior art rejection. For example, the argument is now made that the processor/central station limitation is met by all processors, but for processors associated with payors and payees, disclosed in Chang. In particular, the Examiner argues that a processor/central station is disclosed by "the Internet, all central stations for all payers and payee's banks, settlement processor, payee's own accounts receivable processing system, and payees system receiving and saving the check envelopes prior to payee opening them at their station, 232, 234, 236, 238 and 206." The Examiner also now points to column 10, lines 7+, as disclosing transmitting a directive to transfer funds, arguing "the settlement processor transmits a directive to transfer funds after a payee

generates an electronic deposit."

As for the generation of remittance information associated with a payment, the Examiner now argues "the processor generates remittance information which includes such as amount paid, payment date, payor's account number and information, payee's account information, timestamp of the transmission, digital signatures, etc...", without pointing out where in Chang such is disclosed or to which processor reference is made.

As for the central database, the Examiner now argues that "the database where the check envelope is saved prior to payee accessing it from their terminal for deposit" is the recited central database. Additionally, the Examiner again argues that remittance information is also stored in the payee's account receivable system as well as the payee's bank "to document transactions. Payee has access to all these databases in order to obtain account history records."

In the second Final Official Action the Examiner maintains that Chang discloses generation of a directive to transfer funds only after receipt of a request to access remittance information. However, the Examiner no longer relies upon the batching argument of the March 2003 rejection. Instead, the Examiner now argues "the settlement processor transmits the directive to settle the transaction only after the payee accesses the check envelopes which contain 'remittance' information stored in a database."

For the first time the Examiner addresses limitations of claim 17, arguing that the recited different information segments of remittance information is disclosed by remittance information stored in Chang's check envelope. Further, the Examiner

argues that a “payee’s accounts receivable, and bank account databases include different types of information associated with the payment of bills to different payees.”

Finally, the Examiner argues that “all other claimed limitations are disclosed or inherent. In the Response to Arguments section, the Examiner does not address the traversal arguments of the June 13, 2003 Amendment which are directed to the prior art rejection, other than arguing that the traversal arguments “have been fully considered but they are not persuasive. The Examiner does, however, address in detail the traversal arguments directed to the indefiniteness rejection, finding them unpersuasive.

#### IX. GROUPING OF CLAIMS

Claims 7, 8, 12-14, 17, 22, 23, 26, 27, and 29-32 are pending in this application. Claims 7, 8, 12-14, 17, 22, 23, 26, 27, and 29-32 are finally rejected and subject to this appeal.

Rejected claims 7, 14, and 29 are independent. Accordingly the various claimed embodiments/implementations of the invention are defined within groupings of claims (i) 7, 8, 12, 13, 22 and 26, (ii) 14, 17, 23, and 27, and (iii) 29-32. However, the claims of each group do not stand or fall together. Each of claims 7, 8, 12-14, 17, 22, 23, 26, 27, and 29-32 recite features which form an independent basis for allowance.

## X. ARGUMENT

Claims 7, 8, 12-14, 17, 22, 23, 26, 27 and 29-30 stand finally rejected under 35 U.S.C. § 102(e) as anticipated by Chang et al. (U.S. Patent No. 5,884,288), and in the alternative, finally rejected under 35 U.S.C. § 103(a) as obvious over Chang. Claims 7, 8, 12-14, 17, 22, 23, 26, and 27 also stand finally rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Appellants respectfully traverse the rejections based on the prior art applied against the claims now pending on appeal, as well as traverse the indefiniteness rejection.

As discussed below, it is respectfully submitted that the Examiner has not met the burden of proof in establishing that the appealed claims are anticipated, has not met the burden of proof in establishing that the appealed claims are obvious, has failed to provide the required factual basis and reasonable rationale for both the prior art and indefiniteness rejections, and has failed to apply art which teaches or suggests the invention as claimed.

### 1. LACK OF DUE PROCESS IN THE EXAMINATION

Due process of law requires that applicants receive a full, fair and impartial hearing. In the prosecution of a patent application, this requires that Official Actions, such as those rejecting claims, be made on the basis of objective evidence and sound reasoning. Official Actions should not be made arbitrarily or based on unsupported speculation and the like. Due process also mandates a fair opportunity to be heard. Hence, in the prosecution of a patent application, not only should applicants be given

a chance to respond to Official Actions setting forth the basis for rejection of the claims, but the arguments presented in such a response should be given due consideration prior to final Action being taken. See for example, In re De Blauwe, 222 USPQ 191 (Fed. Cir. 1984); In re Ludtke, 169 USPQ 563 (CCPA 1971).

MPEP §707.07 requires that "before a final rejection is in order a clear issue should be developed between the Examiner and applicant." Indeed, the Manual states that "the references should be fully applied" (emphasis added), so as to deal justly with the applicant as well as the public. The Manual goes on to state that "present practice does not sanction hasty and ill-considered...rejections". "The applicant who is seeking to define his or her invention in claims that will give him or her the patent protection to which he or she is justly entitled should receive the cooperation of the examiner to that end." "The examiner should never lose sight of the fact that in every case the applicant is entitled to a full and fair hearing, and that a clear issue between applicant and examiner should be developed, if possible..."(emphasis added).

In relevant part, MPEP § 707.07(g) instructs an Examiner that "[w]here a major technical rejection is proper, it should be stated with a full development of reasons rather than by a mere conclusion coupled with some stereotyped expression" (emphasis added).

The case history evidences that the Examiner has persistently failed to properly consider detailed arguments presented in traversal of the prior art rejections, and has failed to provide any reasonable or understandable basis for rejection or maintaining the rejection in view of the points explicitly raised in

response to Official Actions. For these reasons, it is respectfully submitted that a "clear issue" has never been reached with respect to the rejection of the claims.

As noted above, MPEP Section 706.07 clearly requires that "before final rejection is in order, a clear issue should be developed between the examiner and applicant." Indeed, by making the action of July 18, 2003 final without addressing the prior art traversal arguments of June 13, 2003, applicants have clearly not been provided with the "cooperation of the Examiner", required by MPEP Section 706.07, in defining the invention by claims that will give applicants the patent protection to which they are "justly entitled."

Had the Examiner responded to the responses by providing reasonably understandable arguments rebutting the traversal arguments presented in the responses to the prior non-final Official Actions and the first Final Official Action, and then maintained the rejection of the claims on the same basis as previously asserted, an issue would have been reached. However, the Examiner has instead apparently chosen to not address the detailed traversal arguments, and simply maintain positions which cannot be reasonably understood or supported, or shifted grounds of rejection.

Thus, the issues in this case remain unfocused and the basis for rejection remains unclear.

Based on the above, it is respectfully submitted that applicants have been deprived of their rights to due process under law due to the Examiner's persistent rejection of the claims, without any reasonable basis to do so and in a manner which

effectively denies applicants their right to be heard, as well as the Examiner's failure to comply with the mandates of MPEP 706.

## **2. THE EXAMINER HAS FAILED TO ESTABLISH A PRIMA FACIE CASE**

The initial burden of establishing a basis for denying patentability to a claimed invention rests upon the examiner. In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Thorpe, 777 F.2d 695, 227 USPQ 964 (Fed. Cir. 1985); In re Piasecki, 745 F.2d 1468, 223 USPQ 785 (Fed. Cir. 1984).

The Examiner must provide sufficient factual basis or rationale as to how features of the invention recited in the claims are taught or suggested in the applied art. Uniroyal, Inc. v. Rudkin-Wiley Corp., 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988). The limitations required by the claims cannot be ignored. See In re Wilson, 424 F.2d 1382, 165 USPQ 494 (CCPA 1970). No claim limitation, including one which is functional, can be ignored. See In re Oelrich, 666 F.2d 578, 212 USPQ 323 (CCPA 1981). All words in a claim must be considered in deciding the patentability of that claim against the prior art. Each word in a claim must be given its proper meaning, as construed by a person skilled in the art. Where required to determine the scope of a recited term, the disclosure may be used. See In re Barr, 444 F.2d 588, 170 USPQ 330 (CCPA 1971).

Discussed above, each of Claims 7, 8, 12-14, 17, 22, 23, 26, 27, and 29-32 stand finally rejected under 35 U.S.C. §102(e) as anticipated by Chang, and in the alternative, finally rejected under 35 U.S.C. § 103(a) as obvious over Chang.

Independent claim 7 requires, at least in part, that (1) a central database be

configured to store remittance information generated by a processor (which is also required by the claim to transmit a directive to transfer funds to a first deposit accounts associated with a first payee in accordance with a received instruction to pay a first bill from a first user station representing a first payer), and (2) the processor be configured to receive a request to access the remittance information from a payee user station, to retrieve the remittance information from the central database based upon the received access request, and to transmit the retrieved remittance information to the payee user station.

Independent claim 14 requires, at least in part, (1) a plurality of second network stations configured to transmit requests, via a communications network, to access remittance information, which is associated with the payment of the bills and which has been generated and stored by a central network station (the claim also requires that the central network station also generate directives to transfer funds to a plurality of different deposit accounts based upon received instructions to make payments of bills transmitted by a first plurality of network stations, representing a first plurality of users), and (2) that the central network station be configured to receive the transmitted requests, to access and retrieve the stored remittance information in response to the received requests, and to transmit, via the communications network, the retrieved remittance information to the plurality of network stations.

Independent claim 29 requires, at least in part, a plurality of second network stations configured to transmit requests, via a communications network, to access remittance information stored in a central database, which is associated with

payments to a plurality of payees and which has been generated by a central network station (the claim also requires that the central network station also generate directives to transfer funds to a plurality of different deposit accounts based upon received instructions to make payments to a plurality of different payees transmitted by a first plurality of network stations, representing a first plurality of users), and to receive, via the communications network and based upon the transmitted requests, the stored remittance information.

To establish a *prima facie* case, the Examiner must provide sufficient factual basis or rationale as to how features of the invention recited in the claims are taught or suggested in the applied art.

Introduced above, in the Official Action of May 9, 2002 and the Official Action of March 10, 2003, the Examiner argued that Chang's electronic check is equivalent to a generation and/or transmission of one or more directives to transfer funds to one or more deposit accounts responsive to receipt of one or more payment requests, as required by the independent claims of the present application. In the second Final Official Action, dated July 18, 2003, the Examiner argues, as can be best understood, that the required directive is disclosed in column 10, lines 7+, of Chang by the operations of the settlement processor (detail 238).

Chang's electronic check is not a directive to transfer funds to a deposit account. Rather, as in conventional bill payment scenarios utilizing paper checks, the electronic check is a financial instrument, albeit electronic, payable to a particular payee that must be presented by the payee to its bank. As expressly disclosed by Chang, an electronic check must be cleared and settled by a payee bank, as would

any conventional paper check. Therefore, the electronic check of Chang does not direct a transfer of funds to a deposit account. Instead, the payee must tell a bank where, i.e., which deposit account, to deposit funds from the electronic check. The operations of the settlement processor, referenced by the Examiner in the second Final Office Action, to credit funds to a payee are only performed after the payee has deposited Chang's electronic check.

Regarding the required generation and storage of remittance information associated with one or more requested payments, as required by the independent claims, and the central database for storing the generated remittance information, as required by independent claims 7 and 29, limited remittance information is included in the electronic check of Chang. However, as remittance information is included in the electronic check transmitted to the payee, Chang lacks any need for, and hence any disclosure of, storage of generated remittance information. The Examiner-referenced portions of Chang at best disclose (i) billing information generated by a payee, (ii) billing information stored by a payee, and (iii) storage of an electronic check subsequent to that electronic check being delivered to a payee.

As to the required payee request to access stored remittance information, that is generated responsive to a payment request, retrieval of the stored remittance information based upon the received access request, and transmission of the retrieved remittance information, as required by independent claims 7, 14, and 29, contrary to the Examiner's contention, there is nothing in Chang to suggest that a payee transmits a request to access stored remittance information stored by the payee's bank. The payee's receipt of an electronic check can in no way be

construed to be a request for, retrieval of, and transmission of, stored remittance information. In fact, Chang explicitly discloses that remittance information is pushed to the payee, i.e., included in the electronic check, and thus there is no need for such a request to pull remittance information.

The capability of one of Chang's payees to access its own databases of information, as argued by the Examiner, is irrelevant. This is because the independent claims of the present application each require (i) a processor or central station configured to receive a request to make one or more payments and to generate remittance information associated with that payment, or payments, and (ii) storage of the generated remittance information, with independent claims 7 and 14 further requiring, after generation and storage of the remittance information, the processor or central station configured to (i) receive one or more payee request to access the stored remittance information, (ii) retrieve the stored remittance information responsive to the received payee request, or requests, and (iii) transmit the retrieved remittance information responsive to the request, or requests, and with independent claim 29 further requiring (i) the generated remittance information to be stored in a central database, (ii) transmission of one or more payee requests to access the stored remittance information, and (iii) receipt the stored remittance information by a payee responsive to the access request, or requests.

Claims 8 and 22 require transmission to a financial institute of the directive to transfer funds to the first deposit account. Claims 23 and 31 require both transmission of generated directives to financial institutes, and that the generated directives direct a financial institute to transfer funds to a deposit account.

Chang discloses generation of an electronic check by a payer's financial institute (e.g., a bank) and transmission of the generated check to the payee. Chang simply does not disclose transmission of a directive to a payer bank or other financial institute. Thus, in Chang, an electronic check is transmitted by a payer bank to a payee, while claims 8, 23, and 31 require transmission of a directive to transfer funds to a deposit account, not an electronic check, to a payer bank.

Claim 12 requires that the central database be further configured to store the billing information so as to be accessible to another user station representing another different payer. That is, according to claim 12 the central database must store remittance information relating to payments of a first payer of bills from a first payee, as well as billing information relating to bills from a second payee for a second payer, with the remittance information accessible by the first payee and the billing information accessible by the second payer.

As discussed above, Chang does not disclose a central database for storing remittance information generated responsive to a received payment request. Hence, Chang does not disclose a central database as required by claim 12. At best, Chang discloses a database for storing bills received from payees.

Claim 13, which depends from claim 12, requires that the processor which accesses the remittance information at the request of the first payee also be able to access the billing information at the request of the second payer, and additionally to transmit the accessed remittance information to the first payee and the accessed billing information to the second payer. As should be understood from the discussion of claim 12 above, Chang does not disclose such an invention.

Regarding claims 17 and 30, the Examiner argues the remittance information having different information segments is stored in the check envelope of Chang. However, as discussed above, Chang does store remittance information, let alone remittance information having different information segments, each segment associated with payment to a different one of a plurality of payees, and storage of the remittance information so as to accessible to a particular one of a plurality of network stations associated with a particular user.

With regard to claims 26, 27 and 32, claim 26 requires that the processor be further configured to transmit the directive after the receipt of the request to access the remittance information, claim 27 requires that the central network station be further configured to generate each of the directives to transfer the funds in payment of a particular one of the bills to which that directive relates, only after the receipt of the request to access the remittance information associated with the payment of that particular bill, and claim 32 requires the central network station to be further configured to direct transmission of generated directives only after the one payee has transmitted a request to access a stored information segment associated with those payments made to the one payee.

In the Official Action of March 10, 2003, the Examiner placed relevance in the assertion that directives to transfer funds could be batched in rejecting claims 26 and 27. The relevance of batching to the recited claims is entirely unclear. One can only ask what in Chang would suggest "directives ... may not have been generated until after the payee requests remittance information" as asserted by the Examiner.

In the Second Final Official Action, dated July 18, 2003, the Examiner now  
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argues that the requirements of claims 26, 27, and 32 are disclosed by the settlement processor of Chang. In particular, the Examiner argues that the settlement processor only transmits the directive after the payee accesses a payment envelope, which is argued contains remittance information. The payee bank's settlement processor will only perform operations to settle an electronic check, which the Examiner argues includes transmission of a directive, once that payee deposits the electronic check that has already been transmitted by the payor's bank to the payee. That is, in order for remittance information to be available to a payee in Chang, the electronic check must necessarily already have been transmitted to the payee. Thus, Chang does not transmit a directive, or even an electronic check, dependent upon a payee request for remittance information, as required by claims 26, 27, and 32.

Hence, it is respectfully submitted that the Examiner has failed to establish a *prima facie* basis for the rejection of the claims in the Second Final Official Action.

**3. THE APPLIED REFERENCE FAILS TO TEACH OR SUGGEST THE CLAIMED INVENTION**

Anticipation, under 35 U.S.C. §102, requires that each element of the claim in issue be found, either expressly described or under principles of inherency, in a single prior art reference. Although anticipation requires only that the claim under attack "read on" something disclosed in the reference, all limitations of the claim must be found in the reference, or "fully met" by it. See Kalman v. Kimberly-Clark Corp., 713 F.2d 760, 218 USPQ 781 (Fed. Cir. 1983).

Inherency requires certainty, not speculation. In re Rijckaert, 9 F.3rd 1531, 28 USPQ2d 1955 (Fed. Cir. 1993); In re King, 801 F.2d 1324, 231 USPQ 136 (Fed. Cir. 1986); W. L. Gore & Associates, Inc. v. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983); In re Oelrich, 666 F.2d 578, 212 USPQ 323 (CCPA 1981); In re Wilding, 535 F.2d 631, 190 USPQ 59 (CCPA 1976). Objective evidence must be relied upon to defeat the patentability of the claimed invention. Ex parte Natale, 11 USPQ2d 1222 (BPAI 1988).

In rejecting claims under 35 U.S.C. 103(a), it is incumbent upon the Examiner to establish a factual basis to support the legal conclusion of obviousness. Stratoflex, Inc. v. Aeroquip Corp., 218 USPQ 871 (Fed. Cir. 1983); In re Warner, 154 USPQ 173 (CCPA 1967). It also is incumbent upon the Examiner to provide a basis in fact and/or cogent technical reasoning to support the conclusion that one having ordinary skill in the art would have been motivated to combine references to arrive at a claimed invention. Uniroyal, Inc. v. Rudkin-Wiley Corp., 5 USPQ2d 1434 (Fed. Cir. 1988). In so doing, the Examiner is required to make the factual determinations set forth in Graham v. John Deere Co. of Kansas City, 148 USPQ 459 (1966), and to provide a reason why one having ordinary skill in the art would have been led to modify the prior art reference to arrive at the claimed invention. Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 227 USPQ 657 (Fed. Cir. 1985).

Such a reason must stem from some teaching, suggestion or inference in the prior art as a whole or knowledge generally available to one having ordinary skill in the art. Uniroyal, Inc. v. Rudkin-Wiley, 5 USPQ2d 1434 (Fed. Cir. 1988); Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 227 USPQ 657 (Fed. Cir. 1985); ACS Hospital  
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Systems, Inc. v. Montefiore Hospital, 221 USPQ 929 (Fed. Cir. 1984); In re Semaker, 217 USPQ 1 (Fed. Cir. 1983). Inherency requires certainty, not speculation. In re Rijckaert, 28 USPQ2d 1955 (Fed. Cir. 1993); In re King, 231 USPQ 136 (Fed. Cir. 1986); W. L. Gore & Associates, Inc. v. Garlock, Inc., 220 USPQ 303 (Fed. Cir. 1983); In re Oelrich, 212 USPQ 323 (CCPA 1981); In re Wilding, 190 USPQ 59 (CCPA 1976). Objective evidence must be relied upon to defeat the patentability of the claimed invention. Ex parte Natale, 11 USPQ2d 1222 (BPAI 1988).

In determining obviousness, the inquiry is not whether each element existed in the prior art, but whether the prior art made obvious the invention as a whole for which patentability is claimed. Hartness Int'l, Inc. v. Simplimatic Eng'g Co., 2 USPQ2d 1826 (Fed. Cir. 1987). It is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. In re Wesslau, 147 USPQ 391 (CCPA 1951). Piecemeal reconstruction of prior art patents is improper, In re Kamm, 172 USPQ 298 (CCPA 1972). The Examiner must give adequate consideration to the particular problems and solution addressed by the claimed invention. Northern Telecom, Inc. v. Datapoint Corp., 15 USPQ2d 1321 (Fed. Cir. 1990); In re Rothermel, 125 USPQ 328 (CCPA 1960).

The fact that the prior art could be modified so as to result in the combination defined by the claims does not make the modification obvious unless the prior art suggests the desirability of the modification. In re Deminski, 230 USPQ 313 (Fed. Cir. 1986). The test is what the combined teachings would have suggested to those of ordinary skill in the art. In re Keller, 208 USPQ 817 (CCPA 1981). Simplicity and

hindsight are not proper criteria for resolving obviousness, In re Warner, supra. Furthermore, as the Federal Circuit recently reiterated, reliance on common knowledge and/or common sense also cannot be the basis of finding obviousness (See In re Lee, 61 USPQ 2d 1430 (Fed. Circ. 2002)). The deficiencies in the applied art cannot be remedied by general conclusions which, in view of the disclosure in the present application, may appear to be common sensible.

The proper approach to the issue of obviousness is whether the hypothetical person of ordinary skill in the art, familiar with the references, would have found it obvious to make a structure corresponding to what is claimed. In re Keller, 208 USPQ 871 (CCPA 1981); In re Sernaker, 217 USPQ 1 (Fed. Cir. 1983). Hindsight obviousness after the invention has been made is not the test. In re Carroll, 202 USPQ 571 (CCPA 1979). The reference, viewed by itself and not in retrospect, must suggest doing what applicant has done. In re Shaffer, 108 USPQ 326 (CCPA 1956); In re Skoll, 187 USPQ 481 (CCPA 1975).

Again, the issue is not whether it is within the skill of the artisan to make the proposed modification but, rather, whether a person of ordinary skill in the art, upon consideration of the references, would have found it obvious to do so. The fact that the prior art could be modified so as to result in the combination defined by the claims would not have made the modification obvious unless the prior art suggests the desirability of the modification. See In re Gordon, 221 USPQ 1125 (Fed. Cir. 1984), In re Deminski, 230 USPQ 313 (Fed. Cir. 1986), In re Keller, supra, and In re Laskowski, 10 USPQ2d 1397 (CAFC 1989).

As discussed above, in the Second Final Official Action issued July 18, 2003, all  
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of the pending claims stand rejected under 35 U.S.C. §102(e) as anticipated by Chang, and in the alternative, as obvious under 35 U.S.C. § 103(a) over Chang.

Chang discloses an electronic billing and payment system utilizing electronic money associated with a bank. According to the Chang reference, a biller (payee) delivers an electronic bill to a payer's bank where it is stored in an electronic mailbox associated with the payer. The payer accesses the electronic bill and transmits a payment authorization to the payer bank to pay the bill. As discussed above, the payer bank then generates and transmits to the payee an electronic check payable to the payee. The electronic check includes limited remittance information. The payee then electronically deposits the electronic check in a bank associated with the payee. The payee bank receiving the deposit then clears and settles the electronic check. Also as discussed above, the Chang payment technique is analogous to conventional payment by paper check, with the exception that the check is prepared by the payer's bank upon instruction of the payer and is electronic instead of paper.

Each of independent claims 7, 14, and 29 requires generation and/or transmission of a directive to transfer funds to a deposit account responsive to receipt of a payment request. Chang lacks any disclosure of suggestion of generation and/or transmission of such a directive. The Examiner relies upon Chang's disclosure of an electronic check as the required directive. Chang's electronic check is analogous to a paper check. That is, the electronic check does not direct transfer of funds to a deposit account, as required. Rather, Chang's electronic check is merely a financial instrument that directs payment to a payee. The payee must deposit the electronic check with his or her bank in order to receive funds.

*Not true*

Each of the independent claims also requires generation of remittance advice associated with the requested payment, storage of the generated remittance advice, a payee request to access the stored remittance advice, and a delivery of the stored remittance advice responsive to the received access request. Additionally, independent claims 7 and 29 further require a central database for storage of the generated remittance advice.

The Examiner relies upon the limited remittance advice included in Chang's electronic check and a payee's own records as disclosing these requirements. As discussed above, Chang simply does not teach or suggest storage of generated remittance advice, a payee request to access the stored remittance advice, and a delivery of the stored remittance advice in response to the received access request, let alone a central database for storing generated remittance advice. Chang, in fact, has no need to store remittance advice because according to the disclosed technique, remittance advice is always pushed to a payee (included in the electronic check). Thus, there is never a payee request to access stored remittance advice because the payee always receives remittance advice with the electronic check.

Claims 8 and 22 require transmission to a financial institute of the directive to transfer funds to the first deposit account. Claims 23 and 31 require both transmission of generated directives to financial institutes, and that the generated directives direct a financial institute to transfer funds to a deposit account.

Chang discloses, as discussed above, transmission of an electronic check to a payee. Chang does not disclose transmission of an electronic check to a payer's bank. Further, Chang's electronic check does not direct a funds transfer to a deposit

account. Accordingly, Chang does not teach or suggest the requirements of claims 8, 22, 23, and 31.

Claim 12 requires that central database for storing both generated remittance information accessible to a payee and billing information accessible by a payer. As discussed above, Chang does not teach or suggest a central database for storing remittance information generated responsive to a received payment request. At most, Chang discloses a database configured to store only billing information. Hence, Chang necessarily lacks any teaching or suggestion of the required central database of claim 12.

Claim 13, which depends from claim 12, requires a processor configured to access and transmit the remittance information stored in the central database at the request of a payee, and configured to access and transmit the billing information at the request of a payer. Chang lacks any teaching or suggestion of the requirements of claim 13, as Chang lacks any teaching or suggestion of the required central database, as discussed above.

Claims 17 and 30 require the stored remittance information to have different information segments, each associated with payment to a different one of a plurality of payees. As discussed herein, Chang does not teach or suggest stored remittance information, let alone remittance information having different information segments.

With regard to claims 26, 27 and 32, these claims require that a directive to transfer funds into a deposit account only be transmitted upon a payee requesting access to remittance information. That is, the directive is not released by the processor/central station until the payee requests remittance information.

Chang in no way teaches or suggests such limitations. First, as discussed above, Chang does not teach or suggest such a directive to transfer funds to a deposit account. Rather, Chang discloses an electronic check. In Chang, the electronic check includes remittance information. The electronic check is transmitted to the payee after a payor requests that a bill of the payee be paid. This is the only delivery of remittance information disclosed in Chang. Thus, in Chang, in order for remittance information to be available to a payee, the electronic check must necessarily already have been transmitted to the payee. Accordingly, Chang lacks any teaching or suggestion of the required transmission of a directive to transfer funds to a deposit account only after a payee requests access to remittance information.

In view of the above, it is respectfully submitted that Chang fails to teach or suggest the invention as recited in claims 7, 8, 12-14, 17, 22, 23, 26, 27, and 29-32.

#### **4. THE CLAIMS ARE DEFINITE**

An analysis under 35 U.S.C. § 112 begins with a determination of whether the claims do, in fact, set out and circumscribe a particular area with a reasonable degree of precision and particularity. Claim language is viewed not in a vacuum, but in light of the teachings of the prior art and of the application disclosure as it would be interpreted by one possessing the ordinary level of skill in the art. *In re Johnson*, 558 F.2d 1008, 194 USPQ 187 (CCPA 1977); *In re Moore*, 439 F.2d 1232, 169 USPQ 236 (CCPA 1971).

A decision on whether a claim is invalid under 35 U.S.C. § 112, second  
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paragraph, requires a determination of whether those skilled in the art would understand what is claimed when the claim is read in light of the specification. Seattle Box Co. v. Industrial Crating & Packing, 731 F.2d 381, 385, 221 USPQ 568, 574 (Fed. Cir. 1984). In determining definiteness, no claim may be read apart from and independent from the disclosure on which it is based. In re Cohn, 169 USPQ 95, 98 (CCPA 1971). In re Kroebel, 183 USPQ 610, 612 (CCPA 1974). A claim must be considered as a whole to determine whether the claim apprises one of ordinary skill in the art of its scope. Soloman v. Kimberly-Clark Corp., 216 F.3d 1372, 55 USPQ 2d 1279 (Fed. Cir. 2000), Morton Int'l, Inc. v. Cardinal Chem. Co., 5 F.3d 1464, 28 USPQ 2d 1190 (Fed. Cir. 1993).

A fundamental principle of 35 U.S.C. § 112, second paragraph, is that applicants are their own lexicographers. They can define in the claims what they regard as their invention essentially in whatever terms they choose so long as the terms are not used in ways that are contrary to accepted meanings in the art. A claim may not be rejected solely because of the type of language used to define the subject matter for which patent protection is sought. In re Swinehart, 439 F.2d 210, 160 USPQ 226 (CCPA 1971).

Claims 7, 8, 12-14, 17, 22, 23, 26, and 27 stand rejected under 35 U.S.C. § 112, second paragraph, as indefinite.

The Examiner contends that it is unclear what the difference is between the received "instruction, from a first of the plurality of user stations representing a first of the payers, to make payment of a first bill to a first of the payees" and the transmitted "directive to transfer funds to a first of the deposit accounts associated with the first

payee in accordance with the received instruction to pay the first bill" as recited in claim 7.

The Examiner also contends that it is unclear what the difference is between the received "transmitted instructions" (which are defined within the claim to be instructions to make payments of bills and to be transmitted by the first plurality of network stations, representing a first plurality of users) and the generated "directives to transfer funds to a plurality of different deposit accounts based upon the received instructions" as recited in claim 14. The Examiner argues that the instruction(s) and the directive(s) are redundant.

It is respectfully submitted that one of ordinary skill in the art would understand the scope of the inventions recited in claims 7 and 14. Further, the language of claims 7 and 14 is unambiguous as to the difference between the instruction(s) and the directive(s). The recited instruction(s) and the directive(s) set out with precision and particularity the claimed invention. The express language within the claims makes clear that the recital of instruction(s) and directive(s) is not redundant, especially in light of the specification. For example, with reference to page 10, lines 18-24, of the present application, it is disclosed that an instruction to pay a bill of a payee is received at a central station. After receipt of the instruction the central station generates a directive to transfer funds to a deposit account associated with the payee. Thus clearly, the instruction(s) and the directive(s) are not redundant.

Also, the claims do not require receipt of an instruction to transmit a directive, as the Examiner seems to argue. Rather, as will be understood from the above, the claims require receipt of an instruction to make a payment. While generation and/or

transmission of the directive is dependent upon receipt of the instruction, the instruction does not itself instruct generation and/or transmission of the directive.

Accordingly, it is respectfully submitted that claims 7, 8, 12-14, 17, 22, 23, 26, and 27 are not indefinite.

### CONCLUSION

It is respectfully submitted that the Examiner (i) has denied applicants their due process rights under the Constitution of the United States of America, (ii) has failed to establish a prima facie case for the rejections, (iii) failed to reasonably construe that which is taught and suggested by the applied prior art, and (iv) has failed to apply art which teaches or suggests the claimed invention. Thus, the rejection of the pending claims over the applied prior art is improper. Further, it is respectfully submitted that the Examiner has improperly rejected the claims as being indefinite.

In summary, Applicants respectfully submit that the applied reference does not teach or suggest features recited in each of the rejected independent claims, as well as features recited in the dependent claims, and the Examiner has failed provided reasonable evidence to support a contrary conclusion. Accordingly, it is submitted that the art does not provide any teaching, or suggestion within its teachings, which would lead to the features or advantages of the instant invention, and the claims patentably define over the art. Also, Applicants respectfully submit that the claims of the present application are definite and that the Examiner has failed to provide reasonable evidence to support the contrary.

The rejection of the pending claims is in error, and reversal is clearly in order

and is courteously solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 01-2135 and please credit any excess fees to such deposit account.

Respectfully Submitted,

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**APPENDIX OF CLAIMS UNDER APPEAL**

7. (Previously Presented) A system for electronically paying bills using a network having a plurality of user stations, each representing a different one of a plurality of users including payers and payees, the plurality of different users having associated payment accounts and deposit accounts maintained at a plurality of financial institutes, comprising:

    a processor configured to receive an instruction, from a first of the plurality of user stations representing a first of the payers, to make payment of a first bill to a first of the payees, to transmit a directive to transfer funds to a first of the deposit accounts associated with the first payee in accordance with the received instruction to pay the first bill, and to generate remittance information associated with payment of the first bill; and

    a central database configured to store the remittance information so as to be accessible to a second of the plurality of user stations representing the first payee;

    wherein the processor is further configured to receive a request to access the remittance information from the second user station, to retrieve the remittance information from the central database based upon the received access request, and to transmit the retrieved remittance information to the second user station.

8. (Previously Presented) A system according to claim 7, wherein the processor is further configured to transmit the directive to a financial institute.

12. (Previously Presented) A system according to claim 7, wherein:

the processor is further configured to receive a second bill for a second of the payers from a third of the plurality of user stations representing a second of the payees, and to generate billing information corresponding to the received second bill; and

the central database is further configured to store the billing information so as to be accessible to a fourth of the plurality of user stations representing the second payer.

13. (Previously Presented) A system according to claim 12, wherein:

the processor is further configured to receive a request to access the billing information from the fourth user station, to retrieve the stored billing information from the central database based upon the received request to access billing information, and to transmit the retrieved billing information to the fourth user station.

14. (Previously Presented) An electronic bill paying network having a plurality of users including payers and payees, each of the payers having a different payment account, and each of the payees having a different deposit account, comprising:

a communications network;

a first plurality of network stations, representing a first plurality of users, and configured to connect to the communications network and to transmit instructions, via the communications network, to make payments of bills;

a central network station connected to the communications network, and

configured to receive the transmitted instructions, to generate directives to transfer funds to a plurality of different deposit accounts based upon the received instructions, to generate remittance information associated with payment of the bills, and to store the remittance information; and

    a second plurality of network stations, representing a second plurality of users, and configured to connect to the communications network and transmit requests, via the communications network, to access the stored remittance information;

    wherein the central network station is further configured to receive the transmitted requests to access the remittance information, to retrieve the stored remittance information in response thereto, and to transmit, via the communications network, the retrieved remittance information to the second plurality of network stations.

17. (Original) A network according to claim 14, wherein:

    the remittance information includes different information segments; and  
    each of the information segments is associated with the payment of bills to a different one of the second plurality of users, and is stored so as to be accessible to a particular one of the second plurality of network stations representing that one of the second plurality of users.

22. (Previously Presented) A system according to claim 8, wherein the directive directs the financial institute to transfer funds to the first deposit account.

23. (Previously Presented) A network according to claim 14, wherein:

each of the generated directives directs a financial institute to transfer funds to a deposit account; and

the central network station is further configured to transmit each of the generated directives to the financial institute.

26. (Previously Presented) A system according to claim 7, wherein the processor is further configured to transmit the directive after the receipt of the request to access the remittance information.

27. (Previously Presented) A network according to claim 14, wherein the central network station is further configured to generate each of the directives to transfer the funds in payment of a particular one of the bills to which the directive relates only after the receipt of the request to access the remittance information associated with the payment of that particular bill.

29. (Previously Presented) An electronic payment network having a plurality of different payers and a plurality of different payees, each one of the plurality of different payees having a different one of a plurality of deposit accounts, and comprising:

a communications network;

a first plurality of network stations, representing the plurality of different

payees, configured to transmit instructions, via the communications network, to make payments to the plurality of different payees;

a central network station configured to receive the transmitted instructions via the communications network, and to generate (i) directives to transfer funds to the plurality of different deposit accounts and (ii) remittance information associated with the payments to be made to the plurality of different payees by the directed transfer of funds, based on the received instructions;

a central database configured to store the generated remittance information associated with the payments to be made to the plurality of different payees by the directed transfer of fund; and

a second plurality of network stations, representing the plurality of different payees, configured to transmit requests, via the communications network, to access the stored remittance information, and to receive, via the communications network, the stored remittance information based on the transmitted requests.

30. (Previously Presented) A network according to claim 29, wherein:

each of the plurality of different payees is represented by a respective one of the second plurality of network stations;

the generated remittance information associated with the payments to be made to the plurality of different payees includes multiple different information segments;

each of the multiple different information segments is associated with only those of the payments to be made to a respective one of the plurality of different

payees; and

the respective one network station representing the respective one payee is further configured to transmit requests only for the information segment associated with the payments to be made.

31. (Previously Presented) A network according to claim 29, wherein:

the plurality of different payers have a plurality of different payment accounts; the plurality of different payment accounts are maintained at a plurality of different financial institutes;

the generated directives include directives to transfer funds from the plurality of different payment accounts; and

the central network station is further configured to direct transmission of the generated directives to transfer funds from the plurality of different payment accounts, to the plurality of different financial institutes.

32. (Previously Presented) A network according to claim 29, wherein:

each one of the plurality of different payees is represented by a respective one of the second plurality of network stations;

the generated remittance information associated with the payments to the plurality of different payees includes multiple different information segments;

each of the information segments is associated with only those of the payments to be made to a respective one of the plurality of different payees; and

the central network station is further configured to direct transmission of those

of the generated directives to transfer funds to the one deposit account of the one payee only after the respective one network station representing one payee has transmitted the request, via the communications network, to access the stored information segment associated with those of the payments to be made to one payee.